

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE GOOGLE PLAY STORE
ANTITRUST LITIGATION**

THIS DOCUMENT RELATES TO:

Case No. 3:21-md-02981-JD

Epic Games, Inc. v. Google LLC, Case No. 3:20-cv-05671-JD

**[PROPOSED] ORDER RE:
ADMINISTRATIVE MOTION IN
RESPONSE TO MOTIONS TO SEAL
PORTIONS OF COMPLAINTS**

In re Google Play Consumer Antitrust Litigation, Case No. 3:20-cv-05761-JD

Judge James Donato

In re Google Play Developer Antitrust Litigation, Case No. 3:20-cv-05792-JD

Utah v. Google LLC, Case No. 3:21-cv-05227-JD

Case Nos. 3:21-md-02981-JD;
3:20-cv-05671-JD; 3:20-cv-05761-JD;
3:20-cv-05792-JD; 3:21-cv-05227-JD

[PROPOSED] ORDER RE: ADMINISTRATIVE MOTION
IN RESPONSE TO MOTIONS TO SEAL PORTIONS OF COMPLAINTS

1 On August 5, 2021, Defendants Google LLC, Google Payment Corp., Google Ireland
2 Limited, Google Commerce Ltd., and Google Asia Pacific Pte. Ltd. (collectively, “Google”) filed
3 an Administrative Motion in Response to Motions to Seal Portions of Complaints (*In re Google*
4 *Play Store Antitrust Litigation*, Case No. 3:21-md-02981-JD, ECF Nos. 62, 63, 65; *Epic Games,*
5 *Inc. v. Google LLC*, Case No. 3:20-cv-05671-JD, ECF No. 157; *In re Google Play Consumer*
6 *Antitrust Litigation*, Case No. 3:20-cv-05761-JD, ECF No. 185; *In re Google Play Developer*
7 *Antitrust Litigation*, Case No. 3:20-cv-05792-JD, ECF No. 128; *Utah v. Google LLC*, Case No.
8 3:21-cv-05227-JD, ECF No. 93) pursuant to Civil Local Rules 7-11 and 79.5.

Having considered Defendant Google’s Administrative Motion, the Declaration of Andrew Rope submitted in support thereof (“Rope Decl.”), and all other matters presented, and having determined that pursuant to Ninth Circuit precedent compelling reasons exist for sealing this information (*see Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006) (compelling reasons justifying the sealing of court records generally exist “when such ‘court files might have become a vehicle for improper purposes[.]’”)), **IT IS HEREBY ORDERED THAT:**

15 Google's Administrative Motion is GRANTED and the documents listed below shall
16 remain under seal as set forth in the following table:

Document	Information sought to be sealed	Reason for Sealing	Ruling
<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 76, page 26, line 25 (between “confirmed that” and “including the United States.”).	Contains non-public information regarding confidential business analyses of competitors (<i>see</i> Rope Decl., ¶ 8).	
<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 76, page 27, line 1 between “only” and “of.”	Contains non-public information regarding confidential business analyses of competitors (<i>see</i> Rope Decl., ¶ 9).	

1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 86, page 30, line 21 (beginning after “stated that”) to the end of the sentence on line 24 (ending before “Rather”), and line 24 after “Rather” to line 25 (before “instead”).	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 10).	
6	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 101, page 35, line 26 (beginning after “refrain from”) to page 36, line 1 (ending before “(“anti-fragmentation provision”.”)	Contains non-public information regarding confidential business strategies as to negotiations with counterparties and confidential agreements with counterparties (see Rope Decl., ¶ 11).	
12	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 111, page 39, line 1 (beginning after “stated that”) to the end of the sentence on line 2 (ending before “One key”), line 3 (beginning after “was”) to the end of the sentence on line 3 (ending before “In response”), and line 4 (beginning after “among other things, to” to the end of the sentence on line 5, excluding “(emphasis in original).”.	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 12)	
21	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 123, page 41, line 14 between “placement exclusivity” and “Nokia.”	Contains non-public information regarding confidential business negotiations with a potential contractual counterparty (see Rope Decl., ¶ 13).	

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1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 127, page 43, line 1 (beginning after “discussing”) to line 2 (ending before “to address”), line 2 (between “address the” and “of MNOs”).	Contains non-public information regarding confidential business negotiations with a potential contractual counterparty (see Rope Decl., ¶ 14).	
6	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 128, page 43, line 8 (beginning after “time that”) and ending at the end of the sentence on line 9 (ending before “In 2009”).	Contains non-public information regarding the terms of confidential agreements with counterparties (see Rope Decl., ¶ 15).	
10	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 128, page 43, line 11-12 (between “received” and “of a given purchase”), line 12 (between “received” and “and Google”), line 12 (between “remaining” and “for”), line 13 (between “its” and “Google understood”).	Contains non-public information regarding the terms of confidential agreements with counterparties (see Rope Decl., ¶ 16).	
16	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 128, page 43, line 13 (between “this” and “revenue share”).	Contains non-public financial information (see Rope Decl., ¶ 17).	
19	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 129, page 43, line 20 (after “approximately”) to the end of the sentence on line 21.	Contains non-public information regarding confidential business strategies and negotiations with potential contractual counterparties (see Rope Decl., ¶ 18).	

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1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 130, page 44, line 1 (beginning after “gets us”) to line 2 (ending before “while the”), line 2-3 (between “while the” and “(but”), line 3 (between “(but” to the end of the sentence on line 3.	Contains non-public information regarding confidential business strategies and negotiations with potential contractual counterparties (see Rope Decl., ¶ 19).	
6	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 131, page 44, line 7 (between “called” and “which required”), line 9 (between “dubbed project” and “and”), and line 11 (after “project”) to the end of the sentence	Contains non-public information regarding confidential business strategies and terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 20).	
12	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 132, page 44, line 21 (beginning after “identifies”) to line 22 (before “as a solution”).	Contains non-public information regarding confidential business strategies with respect to a potential contractual counterparty (see Rope Decl., ¶ 21).	
17	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 133, page 45, line 5 (between “only” and “of the time”).	Contains non-public information regarding confidential business analyses of competitors (see Rope Decl., ¶ 22).	
21	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 133, page 45, line 11 (beginning at “estimated at”) to the end of the sentence (ending before “This exclusive”).	Contains non-public information regarding the revenue effects of an event (see Rope Decl., ¶ 23).	

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1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv- 05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 135, pages 45, line 24 (between “initiative” and “focused on”), line 24-25 (between “focused on” and “and attempted”), line 27 (beginning after “abandon its”) to page 46, line 2 (before “Samsung to abandon”), page 46, line 3 (between “Samsung Galaxy Store” and “integrated approach”), and page 46, line 5 (beginning after “sideloading”) to the end of the sentence on line 8.	Contains non-public information regarding confidential business strategies and non- public information regarding terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 24).	
10	<i>Utah v. Google LLC</i> , Case No. 3:21-cv- 05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 136, page 46, line 12 (between “With” and “Google initially”), and line 12 (between “up to” and “in return”).	Contains non-public information regarding a confidential business strategy and terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 25).	
16	<i>Utah v. Google LLC</i> , Case No. 3:21-cv- 05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 136, page 46, line 16 (beginning after “thereby would”) to the end of the sentence on line 17 (ending before “At the”), line 17-18 (between “would obtain” and “for Android”), line 18 (beginning after “not”) to the end of the sentence (ending before “These”), and line 18 (between “These” and “would include”).	Contains non-public information regarding terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 26).	

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Case Nos. 3:21-md-02981-JD;
3:20-cv-05671-JD; 3:20-cv-05761-JD;
3:20-cv-05792-JD; 3:21-cv-05227-JD

1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 136, page 46, line 24 (beginning after “using a”) to line 25 (ending before “(Google offered”), and line 25 (beginning after “Samsung would”) to the end of the paragraph on line 26.	Contains non-public information regarding terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 27).	
6	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 136, page 47, line 2 (beginning after “YouTube”) to line 5 (ending before “and”).	Contains non-public information regarding terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 28).	
10	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 136, page 47, line 7 (beginning after “publisher”) to line 8 at the end of the sentence.	Contains non-public information regarding a confidential business strategy and terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 29)	
16	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 136, page 47, line 9 (beginning after “Samsung’s”) to line 10 (ending before “to make competition”).	Contains non-public information regarding terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 30)	
21	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 137, page 47, line 12 (beginning at the start of the paragraph) and ending before “was scheduled.”	Contains non-public information regarding terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 31).	

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1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 137, page 47, line 14 (beginning after “Samsung”) to the end of the sentence on line 16.	Contains non-public information regarding terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 32).	
6	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 138, page 47, line 20 (beginning after “the need to”) to line 20 (ending before “to OEMs”), line 22 (between “avoid the” and “figure”), and line 23 (beginning after “substantial”) until the end of the sentence (ending before “Google foresaw”).	Contains non-public information regarding confidential business strategies with respect to negotiations with potential contractual counterparties (see Rope Decl., ¶ 33).	
12	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 138, page 47, line 26 (between “in order to” and “when”).	Contains non-public information regarding confidential business strategies with respect to negotiations with a potential contractual counterparty (see Rope Decl., ¶ 34).	
17	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 139, page 48, line 4 (beginning at the start of the paragraph) and ending before “negotiations,” line 5 (between “terminated” and “and”), and line 6 (between “titled” and “was merely”).	Contains non-public information regarding terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 35).	
22	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 139, page 48, line 7 (beginning after “According to Google, the”) to line 9 at the end of the sentence.	Contains non-public information regarding confidential business strategies with respect to negotiations with a potential contractual counterparty (see Rope Decl., ¶ 36).	

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1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 140, page 48, line 10 (between “to the” and “was the”), and 11 (beginning after “revenues for”) to line 12 at the end of the sentence (ending before “That proposal”).	Contains non-public information regarding confidential business strategies with respect to negotiations with a potential contractual counterparty (see Rope Decl., ¶ 37).	
6	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 141, page 48, line 15 (beginning at the start of the paragraph) to the end of the sentence on line 19 (ending before “Any app”).	Contains non-public information regarding confidential business strategies with respect to negotiations with a potential contractual counterparty (see Rope Decl., ¶ 38).	
11	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 142, page 48, lines 24-25 (between “With” and “Google intended”).	Contains non-public information regarding confidential business strategies and terms offered during negotiations with a potential contractual counterparty (see Rope Decl., ¶ 39).	
17	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 143, page 49, line 2 (between “support” and “Google also”), and line 4 (beginning after “To do so, Google”) to the end of the sentence on line 6 (ending before “Google coined”).	Contains non-public information regarding confidential business strategies and terms offered during negotiations with potential contractual counterparties (see Rope Decl., ¶ 40).	
23	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 143, page 49, line 6 (beginning after “this strategy”) to the end of the paragraph on line 7.	Contains non-public information regarding confidential business strategies and terms offered during negotiations with potential contractual	

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		counterparties (<i>see</i> Rope Decl., ¶ 41).																									
<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 144, page 49, line 9 (beginning after “scheme”) to the end of the paragraph on line 10.						Contains non-public information regarding a confidential business strategy and terms offered during negotiations with a potential contractual counterparty (<i>see</i> Rope Decl., ¶ 42).																				
<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 144, page 49, figure 4 in its entirety.						Contains non-public information regarding a confidential business strategy and terms offered during negotiations with a potential contractual counterparty (<i>see</i> Rope Decl., ¶ 43).																				
<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 146, page 50, line 9 (between “quantified the” and “of Epic’s”), line 9 (beginning after “decision as”) to line 10 at the end of the sentence (ending before “For Google”), and line 11 (beginning after “that”) to line 12 at the end of the sentence (ending before “This threat”).						Contains non-public information regarding potential revenue effects and confidential business strategies with respect to potential contractual counterparties (<i>see</i> Rope Decl., ¶ 44).																				
<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 147, page 50, line 16 (beginning after “Staff felt that”) to the end of the paragraph on line 19.						Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (<i>see</i> Rope Decl., ¶ 45).																				

1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 148, page 50, line 20 (beginning after “Figure 5”) to line 21 (ending before “as well as”), and line 23 (beginning after “combat the”) to the end of the paragraph on line 24.	Contains non-public information regarding terms offered during negotiations with potential contractual counterparties (see Rope Decl., ¶ 46).	
6	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 148, page 51, figure 5 in its entirety.	Contains non-public information revealing confidential business strategies (see Rope Decl., ¶ 47).	
9	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 149, page 51, line 19 (between “the” and “succeeded”), and line 20 (between “developer” and “from following”).	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 48).	
14	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 149, page 51, line 21 (between “Google saw” and “overarching”), line 21 (between “as an” and “to protect Play Store” on line 22), line 22 (between “revenues by” and “while allowing”), line 23 (between “Google to” and “By the end”), and line 23 (between “2020” and “app developers”).	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 49).	
21	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 183, page 59, line 18 (between “decade later” and “which totaled” on line 19), and line 19 (beginning after “totaled some”) to the end of the paragraph.	Contains non-public financial information (see Rope Decl., ¶ 50).	

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1	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 186, page 60, line 14 (between “collected” and “in overall”), line 14 (between “booked” and “in ‘Gross Profit’”), line 15 (between “and” and “in ‘Operating Income’”), and line 15 (between “over” and “that combines”).	Contains non-public information regarding revenue, costs, and profit margins (see Rope Decl., ¶ 51).	
7	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 189, page 61, line 2 (between “asked” and “and”), and line 3 (beginning after “responded”) to the end of the paragraph.	Contains non-public information regarding pricing (see Rope Decl., ¶ 52).	
10	<i>Utah v. Google LLC</i> , Case No. 3:21-cv-05227-JD, ECF 1 (Ex. A to Rope Decl.)	¶ 192, page 61, line 14 (between “suggested that a” and “commission”).	Contains non-public information regarding confidential business strategies with respect to pricings (see Rope Decl., ¶ 53).	
14	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 33, page 13, line 5 (beginning after “Activision Blizzard”) to the end of the sentence on line 6 (ending before “These deals”).	Contains non-public information revealing confidential business strategies regarding negotiations with potential counterparties (see Rope Decl., ¶ 54).	
19	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 62, page 22, line 27 (beginning after “creating or promoting”) to page 23, line 2 to the end of the paragraph.	Contains non-public information revealing confidential business strategies regarding negotiations with potential counterparties (see Rope Decl., ¶ 55).	
24	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-	¶ 76, page 27, line 19 (beginning after “confirmed that”) to line 20 (ending before “Google has”), and	Contains non-public information revealing confidential internal	

1	JD, ECF 156 (Ex. B to Rope Decl.)	line 22 (between “mere” and “of”).	business analyses (<i>see</i> Rope Decl., ¶ 56).	
3	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 87, page 32, line 5 (beginning after “Apple”) to line 8 (ending before “For example”).	Contains non-public information revealing confidential business strategies (<i>see</i> Rope Decl., ¶ 57).	
6	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 88, page 33, line 7 (beginning after “notes reflect:” to the end of the paragraph at line 7.	Contains non-public information revealing confidential business strategies and negotiations with a counterparty (<i>see</i> Rope Decl., ¶ 58).	
11	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 94, page 34, line 19 (between “Google Play Store” and “ensuring”).	Contains non-public information revealing confidential business strategies regarding negotiations with potential counterparties (<i>see</i> Rope Decl., ¶ 59).	
16	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 96, page 35, line 9 (beginning after “certain OEMs”) to line 10 (ending before “Pursuant to”), and line 11 (beginning after “agrees”) to line 13 (ending before “As described below”).	Contains non-public agreements with contractual counterparties (<i>see</i> Rope Decl., ¶ 60).	
21	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 97, page 35, line 24 (beginning after “poorly—”) to line 26 (ending before “But Epic’s”).	Contains non-public information regarding confidential business analyses of a competitor (<i>see</i> Rope Decl., ¶ 61).	

1	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 98, page 36, line 4 (beginning after “Google’s”) to the end of the sentence on line 7 (ending before “Google feared”), line 8 (beginning after “Google feared that the”) to the end of the sentence on line 13 (ending before “And”), line 14 (beginning after “And finally, Google even”) to the end of the sentence on line 17 (ending before “Google also”), and line 18 (beginning after “recognized that the”) to line 19 (ending before “facing its monopoly”).	Contains non-public information revealing confidential business strategies regarding negotiations with potential counterparties (see Rope Decl., ¶ 62).	
11	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 99, pages 36, line 21 (between “prevent this” and “was its decision”), line 22 (beginning after “Google Play”) to the end of the sentence on page 37, line 3 (ending before “The”), and line 4 (beginning after “included the”) to the end of the paragraph on line 13.	Contains non-public information revealing confidential business strategies regarding negotiations with a potential counterparty (see Rope Decl., ¶ 63).	
18	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 101, page 37, line 20 (beginning after “accept its offer”) to the end of the paragraph on line 28.	Contains non-public information revealing confidential business strategies regarding negotiations with a potential counterparty (see Rope Decl., ¶ 64).	
22	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 103, page 38, line 14 (beginning after “OEMs”) to line 20 (ending before the word “Indeed”), and line 21 (beginning after “recognized that”) to page 39, line 4	Contains non-public information revealing confidential business strategies and forward-looking projections (see Rope Decl., ¶ 65).	

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5	<i>Epic Games, Inc. v. Google LLC, Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)</i>	¶ 105, page 39, line 11 (beginning after “this way”) to the end of the paragraph on page 40, line 4.	Contains non-public information revealing confidential business strategies, the terms of agreements with counterparties, and negotiation positions with counterparties (see Rope Decl., ¶ 66).
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11	<i>Epic Games, Inc. v. Google LLC, Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)</i>	¶ 106, page 40, line 5 (starting at the beginning of the paragraph) and ending before “to take one”, and line 6 (beginning after “illustrative example”) to the end of the paragraph on line 8.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 67).
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16	<i>Epic Games, Inc. v. Google LLC, Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)</i>	¶ 107, page 40, line 9 (starting at the beginning of the paragraph) and ending at the end of the paragraph at line 15.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 68).
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28			Case Nos. 3:21-md-02981-JD; 3:20-cv-05671-JD; 3:20-cv-05761-JD; 3:20-cv-05792-JD; 3:21-cv-05227-JD

1	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 108, page 40, line 16 (beginning after “Moreover”) to line 17 (before “Epic believes”); line 18 (beginning after “based on”) to line 20 (before “that this document”); line 21 (beginning after “anticompetitive requirements”) to the end of the sentence on line 28; line 28 (beginning after “Google further instructs”) to the end of the sentence on page 41, line 2; line 2 (beginning after “Google also”) to the end of the paragraph on line 8.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 69).	
2	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 109, page 41, line 9 (beginning after “As a further restriction”) to the end of the paragraph on line 17.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 70).	
3	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 110, page 41, line 18 (beginning after “In addition”) to the end of the paragraph on line 21.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 71).	
4	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 111, page 41, line 22 (beginning after “More recently”) to the end of the paragraph on page 42 on line 3.	Contains non-public information regarding the terms of confidential agreements with counterparties (see Rope Decl., ¶ 72).	
5	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 112, page 42, line 5 (beginning after “resounding success”) to the end of the paragraph on line 20.	Contains non-public information regarding confidential business strategies and confidential	

1		agreements with counterparties (<i>see</i> Rope Decl., ¶ 73).	
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5	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 113, page 42, line 21-22 (between “that the” and “had ‘impacted’”), and line 22-23 (between “apps by” and “thus intentionally”).	Contains non-public information regarding confidential business strategies and confidential agreements with counterparties (<i>see</i> Rope Decl., ¶ 74).
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10	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 114, page 43, line 14 (between “Another OEM” and “LG”).	Contains non-public information regarding a confidential agreement with a counterparty (<i>see</i> Rope Decl., ¶ 75).
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14	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 115, page 43, line 19 (beginning after “Google’s”) and ending before “was not publicly known”, line 22 (beginning after “provision”) to the end of the sentence on line 24, and page 44, line 9 (beginning after “Google Play”) to the end of the sentence on line 10 (ending before “(Dkt. 91”).	Contains non-public information revealing confidential business strategies, the terms of agreements with counterparties, and negotiation positions with counterparties (<i>see</i> Rope Decl., ¶ 76).
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28			Case Nos. 3:21-md-02981-JD; 3:20-cv-05671-JD; 3:20-cv-05761-JD; 3:20-cv-05792-JD; 3:21-cv-05227-JD

1	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 118, page 45, line 4 (beginning at the start of the paragraph) to the end of the sentence on line 7 (ending before “Beginning”), line 10 (beginning after “typically received” to line 11 (ending before “and Google”), line 11 (beginning after “remaining”) to line 12 (ending before the phrase, “Google understood”), line 12 (between “this” and “revenue”), and line 13 (beginning after “MNOs”) to the end of the paragraph on line 14.	Contains non-public information regarding confidential business strategies and confidential agreements with counterparties (see Rope Decl., ¶ 77).	
11	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 119, page 45, line 17 (beginning after “actual foreclosure”) to line 23 at the end of the sentence, line 23 (beginning after “First, Google”) to page 46, line 2 at the end of the sentence, and line 2 (beginning after “Second”) to line 20 at the end of the paragraph.	Contains non-public information regarding confidential business strategies and confidential negotiations with a potential counterparty (see Rope Decl., ¶ 78).	
18	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 120, pages 46-47, line 21 (starting at the beginning of the paragraph) to the end of the paragraph on page 47, line 3.	Contains non-public information regarding confidential business strategies and confidential negotiations with a potential counterparty (see Rope Decl., ¶ 79).	

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Case Nos. 3:21-md-02981-JD; 3:20-cv-05671-JD; 3:20-cv-05761-JD; 3:20-cv-05792-JD; 3:21-cv-05227-JD

1	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 121, page 47, line 4 (starting at the beginning of the paragraph) until the end of the sentence on line 5 (ending before “However”), and line 12 (beginning after “that Google”) to the end of the paragraph on line 16.	Contains non-public information regarding confidential business strategies for negotiations with a potential counterparty (<i>see</i> Rope Decl., ¶ 80).	
6	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 128, page 49, line 9 (beginning after “Third”) to page 50, line 2 at the end of the paragraph.	Contains non-public information regarding confidential business strategies as to negotiations with counterparties and confidential agreements with counterparties (<i>see</i> Rope Decl., ¶ 81).	
13	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 175, page 64, line 2 (beginning after “this by”) to line 5 (ending before “by restricting”).	Contains non-public information regarding confidential business strategies as to negotiations with counterparties and confidential agreements with counterparties (<i>see</i> Rope Decl., ¶ 82).	
19	<i>Epic Games, Inc. v.</i> <i>Google LLC</i> , Case No. 3:20-cv-05671- JD, ECF 156 (Ex. B to Rope Decl.)	¶ 182, page 65, line 8 (beginning after “include”) to line 11 at the end of the sentence, and line 11 (beginning after “agreements that”) to line 12 at the end of the paragraph.	Contains non-public information regarding confidential business strategies as to negotiations with counterparties and confidential agreements with counterparties (<i>see</i> Rope Decl., ¶ 83).	

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1	<i>Epic Games, Inc. v. Google LLC</i> , Case No. 3:20-cv-05671-JD, ECF 156 (Ex. B to Rope Decl.)	¶ 227, page 72, line 11 (beginning after “include”) to line 14 at the end of the sentence, and line 14 (beginning after “agreements that”) to line 15 at the end of the paragraph.	Contains non-public information regarding confidential business strategies as to negotiations with counterparties and confidential agreements with counterparties (see Rope Decl., ¶ 84).	
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8	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 7, page 3, line 14 (beginning after “entering new”) to the end of the paragraph on line 18.	Contains non-public information regarding the terms of confidential agreements with counterparties (see Rope Decl., ¶ 85).	
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12	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 11, page 4, line 12 (between “States” and “of devices”).	Contains non-public information regarding an internal analysis (see Rope Decl., ¶ 86).	
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16	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 63, page 20, line 11 (beginning after “since 2019”) to the end of the paragraph on line 14.	Contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties (see Rope Decl., ¶ 87).	
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21	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 75, page 25, line 15 (beginning after “separate”) to line 16 (ending before “that date”), and line 17 (beginning after “at”) to the end of the paragraph on line 18.	Contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties (see Rope Decl., ¶ 88).	
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1	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 76, page 25, line 20 (beginning after “Google began”) to the end of the paragraph on page 26, line 7.	Contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties (see Rope Decl., ¶ 89).	
6	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 76, page 26, line 2, fn. 63 between “between” and “and Google”, and beginning after “states that” to the end of the footnote.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 90).	
10	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 76, page 26, line 3, fn. 64 between “For example, Google’s” and “required”, between “required” to “During negotiations”, and after “During negotiations Google” to the end of the footnote.	Contains non-public information regarding confidential negotiation positions and the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 91).	
15	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 77, page 26, line 9 (beginning after “executive.”) to the end of the sentence on line 10 (ending before “And having”), and line 10 (beginning after “succeeded”) to line 11 (ending before “The numbers”).	Contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties (see Rope Decl., ¶ 92).	
22	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 86, page 29, line 5 (after the phrase, “Google had made”) to line 6 (before the “These sales data”), line 7 (after “spend only” and before “of the”).	Contains non-public information regarding Play revenues. (see Rope Decl., ¶ 93).	

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1	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 93, page 31, line 15 (beginning after “Galaxy Store”) to line 21 at the end of the paragraph.	Contains non-public information regarding a confidential agreement with a counterparty (see Rope Decl., ¶ 94).	
5	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 94, page 31, line 22 (beginning after “that Google”) to page 32, line 2 at the end of the paragraph.	Contains non-public information regarding confidential business strategies and negotiations with a counterparty (see Rope Decl., ¶ 95).	
10	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 94, page 32, line 2, fn. 75 between “codenamed” and “and later”, between “and later” and “that, while”, and between “that, while” to the end of the footnote.	Contains non-public information regarding confidential negotiations with a counterparty (see Rope Decl., ¶ 96).	
14	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 110, page 37, line 3 (beginning after “in 2019”) to the end of the paragraph on line 11.	Contains non-public information regarding the terms of confidential agreements with counterparties (see Rope Decl., ¶ 97).	
18	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 111, page 37, line 14 (between “power in” and “Google itself”), and line 15 (beginning after “the new”) to the end of the paragraph on line 15.	Contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties (see Rope Decl., ¶ 98).	
23	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 111, page 37, line 15, fn. 87 starting at the beginning of the footnote to page 38 at the end of the footnote.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 99)	

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1	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 112, page 38, line 1 starting at the beginning of the paragraph to line 13 at the end of the paragraph.	Contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties (see Rope Decl., ¶ 100).	
6	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 114, page 39, line 1 (beginning after “OEM that”) to line 1 before “which also”; line 4 (beginning after “used”) to the end of the paragraph on line 4.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 101).	
11	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 115, page 39, line 5 (between “that the” and “had”), line 5 (between “had” and “its apps” on line 6), and line 9 (beginning after “purpose was”) to the end of the paragraph.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 102).	
16	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 119, page 40, line 12 (beginning after “and by”) to line 13 (ending before “These barriers”).	Contains non-public information regarding confidential business strategies (see Rope Decl., ¶ 103).	
21	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 121, page 41, line 7 (between “only” and “of devices”).	Contains non-public information regarding internal analyses (see Rope Decl., ¶ 104).	
26	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 121, page 41, line 8, fn. 91 (between “2016” and “of Android”).	Contains non-public information regarding confidential business analyses of competitors (see Rope Decl., ¶ 105).	

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1	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 130, page 46, line 11 (beginning after “Rather”) to line 12 before “(And, of course”).	Contains non-public information regarding confidential negotiations with a counterparty (see Rope Decl., ¶ 106).	
2	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 133, page 47, line 10 (beginning after “to gain scale”) to the end of the paragraph on line 14.	Contains non-public information regarding confidential negotiations with a potential counterparty (see Rope Decl., ¶ 107).	
3	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 134, page 47, line 15 (starting at the beginning of the paragraph) to the end of the paragraph on line 20.	Contains non-public information regarding confidential business strategies and internal business analyses (see Rope Decl., ¶ 108).	
4	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 150, page 54, line 15 (beginning after “boasted that its”) to line 17 (ending before “that is”), and line 19 (beginning after “that there”) to the end of the paragraph on line 23.	Contains non-public information regarding confidential business strategies (see Rope Decl., ¶ 109).	
5	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 150, page 54, line 23, fn. 106 beginning after “restraints” to the end of the footnote.	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 110).	
6	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 151, page 55, line 2 (beginning after “as of”) to the end of the paragraph on line 2.	Contains non-public information regarding internal data (see Rope Decl., ¶ 111).	

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1	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 153, page 55, line 5 (beginning after “in a 2018”) to the end of the paragraph on line 12.	Contains non-public information regarding confidential business strategies with respect to a nonparty competitor (see Rope Decl., ¶ 112).	
6	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 156, page 55, line 21 (beginning after “Google’s fear of a”) to the end of the paragraph on page 56, line 2.	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 113).	
10	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 170, page 60, line 14 (beginning after “2009 that”) to line 15 (ending before “and today”), and line 15 (beginning after “costs at”) to the end of the paragraph at line 17.	Contains non-public information regarding pricings (see Rope Decl., ¶ 114).	
15	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 174, page 61, line 14 (between “set at” and “But for”).	Contains non-public information regarding costs and pricing (see Rope Decl., ¶ 115).	
19	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 176, page 61, line 22 (beginning after “their company’s”) to the end of the sentence on line 22 (ending before “One”), and line 23 (beginning after “presentation states”) to the end of the paragraph on line 25.	Contains non-public information regarding costs (see Rope Decl., ¶ 116).	

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Case Nos. 3:21-md-02981-JD;
3:20-cv-05671-JD; 3:20-cv-05761-JD;
3:20-cv-05792-JD; 3:21-cv-05227-JD

1	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 180, page 62, line 15, fn. 122 beginning after “figures are” and ending before “as noted,” and after “processing costs at” to the end of the sentence.	Contains non-public information regarding costs (see Rope Decl., ¶ 117).	
5	<i>In re Google Play Developer Antitrust Litigation</i> , Case No. 3:20-cv-05792-JD, ECF 129 (Ex. C to Rope Decl.)	¶ 197, page 67, line 26 (beginning after “processing costs”) to the end of the sentence on line 26 (ending before “These companies”).	Contains non-public information regarding costs (see Rope Decl., ¶ 118).	
9	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 50, page 12, line 24 between “Indeed, only” and “of active.”	Contains non-public information regarding confidential business analyses (see Rope Decl., ¶ 119).	
13	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 76, page 17, line 28 (between “more than” and “Android”), and page 18, line 3 (between “more than” and “of Android”).	Contains non-public information regarding internal analyses (see Rope Decl., ¶ 120).	
17	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 82, page 19, line 4 (between “revenues of” and “accounting”, line 4 (between “for over” and “percent”), and line 5 (beginning after “year of”) to the end of the sentence.	Contains non-public information regarding Play revenues (see Rope Decl., ¶ 121).	
22	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 84, page 19, line 21 (beginning after “detailed below”) to the end of the paragraph on line 25, ending before “(emphasis added).”	Contains non-public information regarding confidential business strategies and confidential negotiations with a counterparty (see Rope Decl., ¶ 122).	

1	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 85, page 19, line 27 (beginning after “important applications”) to page 20, line 9 (ending before “In short”).	Contains non-public information regarding confidential business strategies and confidential negotiations with a counterparty (see Rope Decl., ¶ 123).	
6	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 86, page 20, line 10 (beginning after “Google to”) to line 15 (ending before “allowing”).	Contains non-public information regarding confidential business strategies with respect to a potential counterparty (see Rope Decl., ¶ 124).	
11	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 87, page 20, line 19 (beginning after “Samsung agreeing”) to the end of the paragraph on line 22.	Contains non-public information regarding confidential business strategies and confidential negotiations with a counterparty (see Rope Decl., ¶ 125).	
16	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 88, page 20, line 26 (between “made around” and “in sales”).	Contains non-public information revealing confidential business revenues and a confidential assessment of a competitor (see Rope Decl., ¶ 126).	
21	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 106, page 24, line 19 (beginning after “memorandum”) to the end of the paragraph on line 23	Contains non-public information regarding confidential business strategies (see Rope Decl., ¶ 127).	

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1	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 109, page 25, line 11 (between “pre-install up to” and “mandatory”); line 13 (beginning after “other services”) to the end of the paragraph on line 16.	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 128).	
6	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 110, page 25, line 18 (beginning after “for flexibility”) to the end of the paragraph on line 21.	Contains non-public information regarding confidential negotiations with a potential counterparty (see Rope Decl., ¶ 129).	
10	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 113, page 26, line 8 (between “covering over” and “of”).	Contains non-public information regarding confidential negotiations with a potential counterparty (see Rope Decl., ¶ 130).	
15	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 116, page 27, line 3 (starting at the beginning of the paragraph) to the end of the paragraph on line 8.	Contains non-public information regarding confidential business strategies (see Rope Decl., ¶ 131).	
19	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 117, page 27, line 9 (starting at the beginning of the paragraph) to the end of the paragraph on line 14.	Contains non-public information regarding confidential business strategies (see Rope Decl., ¶ 132).	
23	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 118, page 27, line 15 (starting at the beginning of the paragraph) to line 16 (ending before “So, Google”), and line 19 (beginning after “Google	Contains non-public information regarding the terms of confidential agreements with counterparties (see Rope Decl., ¶ 133).	

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1	Play.”) to the end of the paragraph on line 21.		
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3	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 119, page 27, line 22 (beginning after “Amazon Store”) to the end of the paragraph on line 24.	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 134).
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8	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 120, page 27, line 26 (beginning after “For instance”) to page 28, line 2 to the end of the paragraph.	Contains non-public information regarding confidential business strategies with respect to potential contractual counterparties (see Rope Decl., ¶ 135).
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12	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 123, page 28, line 16 (beginning after “OEMs may only”) to line 20 (ending before “Further, because”), and line 22 (beginning after “to competitors.”) to the end of the paragraph on line 26.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 136).
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17	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 129, page 29, line 23 (beginning after “Indeed”) to the end of the paragraph on line 28.	Contains non-public information regarding the terms of a confidential agreement with a counterparty (see Rope Decl., ¶ 137).
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21	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 130, page 30, line 3 (between “there be” and “for GMSA apps”); line 3 (beginning after “for GMSA apps”) to the end of the paragraph on line 5.	Contains non-public information regarding confidential business strategies with respect to counterparties in confidential agreements (see Rope Decl., ¶ 138).
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1	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 131, page 30, line 9 (beginning after “2014 presentation”) to the end of the paragraph on line 10.	Contains non-public information regarding confidential business strategies with respect to counterparties in confidential agreements (see Rope Decl., ¶ 139).	
2	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 132, page 30, line 14 (beginning after “recognized that”) to the end of the paragraph on line 15.	Contains non-public information regarding confidential business strategies with respect to counterparties in confidential agreements (see Rope Decl., ¶ 140).	
3	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 133, page 30, line 16 (beginning after “Weaving the”) to line 17 (ending before “with major”), and line 18 (beginning after “car...”) to the end of the paragraph on line 19.	Contains non-public information regarding confidential business strategies with respect to counterparties in confidential agreements (see Rope Decl., ¶ 141).	
4	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 134, page 30, line 21 (beginning after “respond by”) to the end of the paragraph on line 23.	Contains non-public information regarding confidential business strategies with respect to counterparties in confidential agreements (see Rope Decl., ¶ 142).	
5	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 135, page 30, line 24 (starting at the beginning of the paragraph) to page 31, line 3 at the end of the paragraph.	Contains non-public information regarding confidential business strategies and the terms of confidential agreements with counterparties (see Rope Decl., ¶ 143).	
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1	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 136, page 31, line 4 (beginning after “that over”) to line 6 (ending before “it remains”), and line 7 (between “have entered” and Google’s intent”).	Contains non-public information regarding confidential business strategies with respect to potential counterparties in confidential agreements (see Rope Decl., ¶ 144).	
7	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 137, page 31, line 11 (beginning after “Google employee”) to the end of the paragraph on line 17.	Contains non-public information regarding confidential business strategies with respect to potential counterparties in confidential agreements (see Rope Decl., ¶ 145).	
13	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 138, page 31, line 19 (between “more than” and “per year”), and line 19 (beginning after “by 2023”) to the end of the paragraph on line 20.	Contains non-public information regarding confidential business strategies with respect to confidential agreements (see Rope Decl., ¶ 146).	
17	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 144, page 32, line 18 (beginning after “In 2014”) to line 22 (ending before “This ensured”).	Contains non-public information regarding confidential business strategies with respect to potential counterparties in confidential agreements (see Rope Decl., ¶ 147).	

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1	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 158, page 36, line 3 (beginning after “unknown”) to line 4 (ending before “Google admits”), line 6 (beginning after “proven a big risk.”) to line 8 (ending before “Thus, Google”), and line 10 (beginning after “that app store”) to the end of the paragraph on line 11.	Contains non-public information regarding confidential business strategies and confidential negotiations with a counterparty (see Rope Decl., ¶ 148).	
8	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 187, page 42, line 24 (beginning after “In particular”) to the end of the paragraph on line 27.	Contains non-public information regarding confidential negotiations with a potential contractual counterparty (see Rope Decl., ¶ 149).	
13	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 193, page 44, line 7 (between “than the” and “revenue share”).	Contains non-public information regarding costs and profit margins (see Rope Decl., ¶ 150).	
17	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 194, page 44, line 11 (beginning after “recognize that”) to the end of the paragraph on line 13.	Contains non-public information regarding costs and profit margins (see Rope Decl., ¶ 151).	
21	<i>In re Google Play Consumer Antitrust Litigation</i> , Case No. 3:20-cv-05761-JD, ECF 132 (Ex. D to Rope Decl.)	¶ 195, page 44, line 14 (beginning after “has”) to the end of the paragraph on line 15	Contains non-public information regarding costs and profit margins (see Rope Decl., ¶ 152).	

1 IT IS SO ORDERED.
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3 Dated: _____, 2021

4 Honorable James Donato
5 United States District Judge
Northern District of California
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